

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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DONALD J. TRUMP FOR PRESIDENT,  
INC., *et al.*,

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity as  
Secretary of the Commonwealth of  
Pennsylvania, *et al.*,

Defendants.

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Civil Action No. 2:20-cv-00966-NR

Judge J. Nicholas Ranjan

**[PROPOSED] ORDER**

Upon consideration of Defendant-Intervenors Citizens for Pennsylvania’s Future and Sierra Club’s Motion to Compel Discovery from Plaintiffs, and for the reasons set forth in the accompanying Memorandum of Law,

It is hereby ORDERED that said Motion is GRANTED and Plaintiffs are directed to:

1. provide proportionate discovery responsive to Request Numbers 1 and 15 of Defendant-Intervenors Citizens for Pennsylvania’s Future and Sierra Club’s First Set of Requests for Production of Documents, as narrowed to include documents, data, analysis and communications relating to allegations in the Amended Complaint concerning potential or actual fraud or voter misconduct, including as relates to:
  - a. non-uniform procedures concerning drop boxes in Pennsylvania. Am. Compl. 1 (alleging “inconsistently-enforced regulations of . . . unsecured drop-boxes”); 162 et seq.;

- b. fraudulent voting resulting from the use of drop boxes, absentee ballots, or vote-by-mail in Pennsylvania (*id.* (alleging “threat” of counting of “fraudulent or otherwise ineligible ballots”)); 202-03; 212, 225, 228-29, 243-46;
  - c. fraud resulting from the use of third-party groups to collect absentee or mail ballots in Pennsylvania (*id.* 1 (warning of “fraudsters” who “engage in ballot harvesting, manipulate or destroy ballots, manufacture duplicitous votes, and sow chaos”); 73-77;
  - d. the existence and/or prevalence of fraud, ballot harvesting, ballot manipulation or destruction, or duplicitous voting in Pennsylvania (*id.*);
  - e. the prevalence and/or counting of absentee or mail ballots in Pennsylvania that lack a secrecy envelope, whose envelope contains any text, mark, or symbol which reveals the elector's identify, political affiliation, or candidate preference, or whose envelope does not include on the outside envelope a completed declaration signed by the elector. (*id.*, 5, 91, 153).
2. pay Defendant-Intervenors Citizens for Pennsylvania’s Future and Sierra Club’s reasonable attorney’s fees for bringing their motion, in an amount of \$5,000.

Dated:

By:

Honorable J. Nicholas Ranjan  
United States District Judge